

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN BROYLES, :

Plaintiff, : ECF

- against - : 08 Civ. 03391 (WHP) (JCF)

J.P. MORGAN CHASE & CO., :

**DEFENDANT'S RULE 26
DISCLOSURE STATEMENT**

Defendant. :

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Defendant JPMorgan Chase Bank, N.A. ("JPMorgan Chase"), wrongly named as J.P. Morgan Chase & Co., Defendant JPMorgan Chase & Co., by its attorney, JPMorgan Chase Legal and Compliance Department, Frederic L. Lieberman, Assistant General Counsel, as and for its disclosure pursuant to Fed. R. Civ. P. 26, asserts as follows:

A. The name and, if known, the address and telephone number of each individual other than Plaintiff likely to have discoverable information that the disclosing party may use to support its claims or defenses:

<u>Name</u>	<u>Address</u>
Foster Smith	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Ray Eyles	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Patricia Dever	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Keith Shoemaker	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
David Brown	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Nedim Soylemez	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Tyler Herrald	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815
Robert Trejo	c/o JPMorgan Chase Legal and Compliance Department, 1 Chase Manhattan Plaza, 26th Floor, New York, New York 10081 (212) 552-1815

Foster Smith is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Raymond Eyles is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, the employment, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Patricia Dever is likely to have knowledge of Plaintiff's employment, job responsibilities and performance with JPMorgan Chase during some or all of the relevant time period, of various events referred to in Plaintiff's Complaint, and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Keith Shoemaker is likely to have knowledge of various events referred to in Plaintiff's Complaint and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

David Brown is likely to have knowledge of various events referred to in Plaintiff's Complaint and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Nedim Soylemez is likely to have knowledge of various events referred to in Plaintiff's Complaint and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Tyler Herrald is likely to have knowledge of various events referred to in Plaintiff's Complaint and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

Robert Trejo is likely to have knowledge of various events referred to in Plaintiff's Complaint and of relevant JPMorgan Chase policies and procedures in effect during the relevant time period.

B. Documents, data compilations, and tangible things that the disclosing party may use to support its claims and defenses:

- Plaintiff's employee records file, if any;
- Plaintiff's AccessHR file, if any;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Human Resources Department concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Investment Bank Global Commodities group concerning Plaintiff;
- Relevant documents and/or files, if any, maintained by any individual JPMorgan Chase manager or supervisor regarding Plaintiff;
- Relevant documents and/or files, if any, maintained by JPMorgan Chase's Employee Relations Department concerning Plaintiff;
- Relevant JPMorgan Chase policies, plans, and programs; and
- Relevant documentary communications, if any, whether in letter, memorandum, email, or other format.

C. The provisions of Fed. R. Civ. P. 26(a)(1)(C) are not applicable because Defendant is not seeking damages at this time from Plaintiff.

D. Defendant is investigating what, if any, insurance agreements may apply to Plaintiff's claims and will supplement its response as appropriate.

RESERVATION OF RIGHTS

Defendant reserves its right to supplement and/or amend its Rule 26 Disclosure Statement if and when it deems it appropriate.

Dated: August 1, 2008

**JPMORGAN CHASE LEGAL AND
COMPLIANCE DEPARTMENT**

By:


Frederic L. Lieberman, Esq.

Attorneys for Defendant
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New York, New York 10017
(212) 687-0099

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN BROYLES,

: ECF

Plaintiff,

: 08 Civ. 03391 (WHP) (JCF)

- against -

CERTIFICATE OF SERVICE

J.P. MORGAN CHASE & CO.,

Defendant. :

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I hereby certify that on August 1, 2008 I caused a copy of the following documents:

ANSWER,

DEFENDANT'S RULE 26 DISCLOSURE STATEMENT

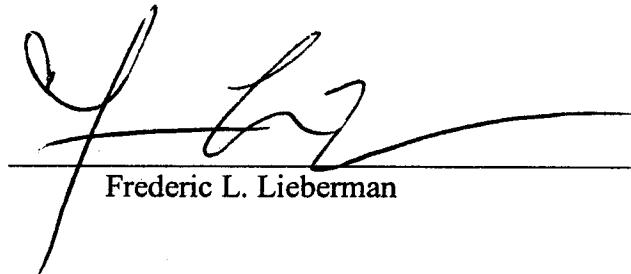
and

NOTICE OF DEPOSITION

to be served by first class mail directed to the attorney for plaintiff at the following address:

Brian Kennedy
535 Fifth Avenue, 23rd Floor
New York, NY 10017

Dated: August 1, 2008



Frederic L. Lieberman